

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

In Re:	*
Michael & Kelly Masella	* Case No. 3:14-cv-00471-JZ
Debtor(s)	*
	*
	*
Michael J. Masella	*
Kelly L Masella	*
39 Union Street	*
Tiffin, OH 44883	*
	*
Vs	*
	*
Bay Area Credit Service, LLC	*
1901 West 10 th Street	*
Antioch, CA 94509,	*
	*
And	*
	*
HOVG, LLC	*
c/o DFG2, LLC	*
8850 West Desert Inn Road	
#102-452	
Las Vegas, NV 89117	
	*
And	*
Shelly James	*
	*
	*
	*
	*
	*
	*
	*

PLAINTIFF'S MOTION TO AMEND COMPLAINT

COMES NOW Plaintiffs, pursuant to Rule 15(1)(a) and 20(a)(2) of the Federal Rules of Civil Procedures, and do hereby amend its complaint as follows:

1. The named Defendant is hereby amended to read: Bay Area Service, LLC and any and all references to Bay Area Services, LLC is to be read as Bay Area Service, LLC.

2. That Bay Area Service, LLC is registered as a fictitious name by HOVG, LLC and is hereby added as an additional Defendant to the complaint. All references to Bay Area Service, LLC should read Bay Area Service, LLC and HOVG, LLC.

MEMORANDUM IN SUPPORT

On February 28, 2014, Plaintiffs filed a complaint against Bay Area Credit Services, LLC and Shelly James. Plaintiff has learned that the correct entity is: Bay Area Credit Service, LLC. Furthermore, Plaintiff has learned that HOVG, LLC registered Bay Area Credit Services as a fictitious name in Ohio (See Exhibit 1) and HOVG, LLC is the registered entity in Ohio.

Plaintiffs makes this motion to amend pursuant to Rule 15(1)(a) and 20(a)(2) as it is within 21 days from the date to which Plaintiffs filed their original complaint. Furthermore, as HOVG, LLC is registered in Ohio and operating in the capacity of Bay Area Credit Service, LLC, it is as culpable as Bay Area Credit Service, LLC for the actions which took place in this matter.

Respectfully submitted this 20th Day of March, 2014.

The Law Offices of Kevin A. Mack, LLC



By: s/ Kevin A. Mack

Kevin A. Mack.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing instrument was served by first class mail or electronic transmission on March 20, 2014, to the following:

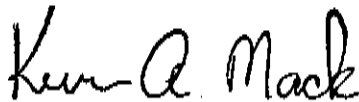
Par Chada or CEO
Bay Area Credit Service, LLC
1901 West 10th Street
Antioch, CA 94509

Registered Agent Bay Area Credit Service, LLC
C T Corporation System
1300 East 9th Street
Cleveland, OH 44114

Par Chadha
HOVG, LLC
1901 West 10th Street
Antioch, CA 94509

HOVG, LLC
DFG2, LLC
8550 West Desert Inn Road
#102-452
Las Vegas, NV 89117

Registered Agent of HOVG, LLC
CSC-Lawyers Incorporating Service (Corporation Service Company)
50 West Broad Street, Suite 1800
Columbus, OH 53215



/s/Kevin A Mack

Kevin A Mack